

## REMARKS

Examiner has rejected claims 1 through 3, 10 through 14, 17, and 22 through 23 under 35 U.S.C. § 102(e) as being anticipated by USPN 6,385,591 B1 (Mankoff). Examiner has rejected claims 15, 16, 24 and 25 under 35 U.S.C. § 103(a) as being unpatentable over Mankoff in view of USPN 6,085,110 A (Nilsson). Examiner has rejected claims 4 through 9 and 18 through 21 under 35 U.S.C. § 103(a) as being unpatentable over Mankoff in view of USPN 6,421,071 B1 (Ramos). Applicant respectfully traverses the rejections and requests reconsideration.

In the discussion below, responds to new arguments raised by Examiner. Then, Applicant points out subject matter in each of the independent claims that is not disclosed or suggested by the cited art. On the basis of this, Applicant believes all the claims are patentable over Mankoff, Nilsson, Ramos and any combination thereof.

### Response to New Arguments raised by Examiner

#### **Claims 1 and 17:**

Examiner has asserted the following: "Applicant alleges that Mankoff does not store the file." This is an incorrect restatement of Applicant's argument.

Applicant has repeatedly and unambiguously conceded that Mankoff accesses (and stores) a file.

Examiner appears to have an understanding of what Mankoff does, but has failed to understand the subject matter set out in claims 1 and 17.

In claims in 1 and 17, when content is selected in a network document a bit-mapped image of the selected content is stored. This is very clearly different than accessing a file, as set out in Mankoff.

Perhaps an example would help make this clearer. For example, following the teaching of Mankoff, suppose an advertising banner appeared in a network document. If a user were to select the banner, then a file (containing a coupon) would be accessed from a separate server associated with the advertisement. A URL to a website for the coupon provider may be included in the file obtained from the separate server.

Now suppose, following the teaching of claim 1, the same banner advertisement is selected. In this case, a bit-mapped image of the banner would be stored along with a network address for the network document in which the banner appears.

As you can see, Mankoff teaches away from the subject matter set out in the present case. Specifically, in Mankoff, when an advertising banner is selected, Mankoff teaches that a separate server is accessed to obtain a file associated with an advertisement. However, following the subject matter of claim 1, the selection of the banner would result in a bit-mapped image of the banner itself being stored along with a network address for the network document containing the banner.

Table 1 below summarizes some of the key differences between the subject matter set out in claims 1 and 17 and Mankoff.

Table 1

	Claim 1	Mankoff
Result of selecting content displayed within a network document	A bit-mapped image of the selected content is stored	A separate server is accessed to obtain a file associated with an advertisement
	A network address for the <i>network document</i> is stored	A URL to a website for the coupon provider may be included in the file obtained from the separate server.

As can be seen from Table 1, Mankoff is performing actions unrelated to the subject matter of claims 1 and 17. Mankoff does not disclose or suggest storing a bit-mapped image of selected content originally displayed in a network document and Mankoff does not disclose or suggest storing a network address for the network document along with the bit-mapped image of the selected content.

Examiner has further asserted the following: "Applicant alleges that Mankoff does not store the network address, but rather an address about the coupon provider. However Mankoff also teaches that coupons can be on the business's web site (col. 5, ll 48-52). In this case the contact info is the network address." This is an incorrect restatement of Applicant's argument.

Examiner again has misunderstood the subject matter set out by claim 1.

Going back to the example of the banner, in Mankoff, a URL to a website for the coupon provider may be included in the file obtained from the separate server. However, Mankoff never discloses or suggests that a network address

for the network document containing the banner is stored (as would happen if the banner were selected as in claim 1 of the present case).

Additionally, Examiner appears to be misinterpreting what Mankoff teaches at column 5, lines 48 through 52. There, Mankoff is teaching that the coupon (file) accessed from the separate server, once accessed by a user, may be stored on the user's PC, rather than the user's PDA. This is irrelevant to the subject matter of the present case.

**Claims 10 and 22:**

Examiner has asserted the following: "In response to applicant's argument that the references fail to show certain features of applicant's invention, it is noted that the features upon which applicant relies (i.e., "a limited indication of clickable images") are not recited in the rejected claim(s)."

Applicant notes that Examiner has misunderstood the argument Applicant has made regarding these claims.

Applicant has very clearly described subject matter in claims 10 and 22 not set out in Mankoff. When doing so, Applicant has very closely followed the exact language in the claims when describing features of the invention not disclosed or suggested by Mankoff.

Examiner's above assertion ignores all of this and focuses on one phrase, "a limited indication of clickable images", that appears once in a very long argument. Further, Applicant never used this phrase to describe a feature set out in Applicant's claim. Rather, this is a phrase Applicant used in a description of

Mankoff. Specifically, Applicant pointed out that Mankoff does not disclose or suggest any limited indication of clickable images, but only that all clickable images on an original web site are displayed. This is a completely accurate description of the teaching of Mankoff.

Applicant has very clearly summarized some of the key differences between the subject matter set out in claims 10 and 22 and Mankoff in the Table 2 reproduced below. Applicant nowhere relies on the phrase “a limited indication of clickable images” in this table.

Table 2

	Claims 10 and 22	Mankoff
When content is selected to be clipped	Selected content from network document is parsed for clickable images.	In Mankoff, content is never selected to be clipped. (An entire web page might be parsed before display of web page. This is not disclosed, but may be inherent in Mankoff. In any event, it is irrelevant to this feature of Applicant's claims)
Where clickable images indicated/displayed	The clickable images found within the content are indicated	All clickable images are displayed as part of the web site.
Result of selecting a clickable image	A bit-mapped image of the selected content is stored	A separate server is accessed to obtain a file associated with an advertisement

As can be seen from Table 2, Mankoff is performing actions unrelated to the subject matter of claims 10 and 22. Mankoff does not disclose or suggest

selected content from network document is parsed for clickable images. Mankoff does not disclose or suggest indicating any clickable images found within the content. Mankoff does not disclose or suggest a bit-mapped image of the selected content is stored when a clickable image is selected. In pointing out this subject matter, Applicant is not relying on the phrase "a limited indication of clickable images", but is relying on the specific language set out in the claims.

**Claims 15 and 24:**

Examiner has asserted the following: "Applicant alleges that Mankoff does not teach parsing selected content for clickable images. However the web page and therefor the content must be inherently selected prior to loading."

Examiner has argued that in Mankoff, the web page and therefor the content must be inherently selected prior to loading. While this may be true, this is not relevant to the subject matter set out in claims 15 and 24.

Particularly, in step (a) of claims 15 and 24, upon a user selecting content within a network document to be clipped, the content is parsed for clickable images. This is not disclosed or suggested in Mankoff nor Nilsson. Neither Mankoff nor Nilsson disclose or suggest a user selecting content within a network document to be clipped. Neither Mankoff nor Nilsson disclose or suggest upon a user selecting content within a network document to be clipped, the content is parsed for clickable images.

The fact that the content of a web page in Mankoff may be selected before loading a web page does not appear to relevant to parsing content for clickable

upon a user selecting the content within a network document to be clipped, as set out in step (a) of claims 15 and 24.

**Subject Matter in each independent claim not disclosed or suggested by prior art**

Below, Applicant points out subject matter in each of the independent claims that is not disclosed or suggested by the cited art. On the basis of this, Applicant believes all the claims are patentable over Mankoff, Nilsson, Ramos and any combination thereof.

**Discussion of Independent claims 1 and 17:**

Claim 1 sets out a method for content clipping. Claim 17 sets out storage media. In step (b) of claims 1 and 17, upon the user selecting content displayed within a network document to be clipped, a bit-mapped image of the selected content is stored within a database, and a network address for the network document is stored along with the bit-mapped image of the selected content. This is not disclosed or suggested by the art cited by Examiner.

Examiner has cited Mankoff as disclosing the subject matter of claims 1 and 17. In Mankoff, a server 25 has a database 27 that contains virtual coupons 40. Each coupon is a data file of information stored in database 27. See Mankoff at column 3, lines 50 through 62. A web page displays a banner advertisement for a coupon. See column 4, lines 5 through 9. When a user clicks on the banner, the client's browser is redirected to the server 25 which sends a virtual coupon (i.e., the data file of information stored in database 27) to a user. See Mankoff at

column 4, lines 8 through 11. The file information may include contact information associated with the coupon provider. This information can include a web site URL for the coupon provider. See Mankoff at column 1, lines 55 through 58.

Mankoff does not disclose or suggest the subject matter disclosed in claims 1 and 17 of the present case. For example, in claims 1 and 17, a bit mapped image of the selected content (originally displayed within a network document) is stored. In Mankoff, this information is not stored. Rather, a file, located on a separate server is downloaded. See Mankoff at column 4, lines 8 through 11. In claims 1 and 17, a network address for the network document is stored along with the bit-mapped image of the selected content. In Mankoff this information is not stored. Rather, as pointed out by Examiner, the coupon file can include a web site URL for the coupon provider. See Mankoff at column 1, lines 55 through 58. However, this is a separate pointer to a company website and is not a network address for the original network document. Mankoff does not disclose or suggest storing a network address for the network document that originally displayed the selected content.



Table 3 below summarizes some of the key differences between the subject matter set out in claims 1 and 17 and Mankoff.

Table 3

	Claim 1	Mankoff
Result of selecting content displayed within a network document	A bit-mapped image of the selected content is stored	A separate server is accessed to obtain a file associated with an advertisement
	A network address for the <i>network document</i> is stored	A URL to a website for the coupon provider may be included in the file obtained from the separate server.

As can be seen from Table 3, Mankoff is performing actions unrelated to the subject matter of claims 1 and 17. Mankoff does not disclose or suggest storing a bit-mapped image of selected content originally displayed in a network document and Mankoff does not disclose or suggest storing a network address for the network document along with the bit-mapped image of the selected content.

**Discussion of Independent claims 4 and 18:**

Claim 4 sets out a method for content clipping. Claim 18 sets out storage media. In step (b) of claims 4 and 18, upon a user selecting the selection tool, a currently displayed network document is parsed for clickable images and a new window is displayed in which any found clickable images are indicated. This is not disclosed or suggested by the art cited by Examiner.

There are notable differences between the subject matter set out in claims 4 and 18 and the subject matter disclosed by Mankoff. For example, in substep

(b.1) of claims 4 and 18, a currently displayed network document is parsed for clickable images. In Mankoff, any parsing that might be done would be performed before the web site is displayed. In substep (b.2) of claims 4 and 18, a new window is displayed that indicates the found clickable images. Mankoff does not disclose or suggest any such new window, but only the original web site is displayed. In substep (b.3) of claims 4 and 18, upon a user selecting one of the clickable images, a bit-mapped image of the selected clickable image is stored for later access by the user. In Mankoff, this information is not stored. Rather, a file, located on a separate server is downloaded. See Mankoff at column 4, lines 8 through 11.

Table 4 below summarizes some of the key differences between the subject matter set out in claims 4 and 8 and Mankoff.

Table 4

	Claims 4 and 18	Mankoff
Upon a selection tool being selected	Selected content from network document is parsed for clickable images.	In Mankoff, content is never selected to be clipped. (An entire web page might be parsed before display of web page. This is not disclosed, but may be inherent in Mankoff. In any event, it is irrelevant to this feature of Applicant's claims)
Where clickable images indicated/ displayed	A new window is displayed that indicates the found clickable images	The clickable images are displayed as part of the web site.
Result of selecting a clickable image	A bit-mapped image of the selected content is stored	A separate server is accessed to obtain a file associated with an advertisement

As can be seen from Table 4, Mankoff is performing actions unrelated to the subject matter of claims 4 and 18. Mankoff does not disclose or suggest a currently displayed network document is parsed for clickable images. Mankoff does not disclose or suggest displaying a new window that indicates the found clickable images. Mankoff does not disclose or suggest a bit-mapped image of the selected content is stored when a clickable image is selected.

Examiner has further argued that Ramos teaches displaying a new window that indicates images.

However, Ramos differs from claims 4 and 18 in that Ramos discloses that when a thumbnail from the window is selected, a thumbnail (not a bit-mapped image) of the stored images is stored in a bookmark file.

Neither Mankoff nor Ramos disclose or suggest substep (b.3) of claim 4 and 18 where upon a user selecting one of the clickable images, a bit-mapped image of the selected clickable image is stored for later access by the user.

#### **Discussion of Independent Claims 10 and 22:**

Claim 10 sets out a method for content clipping. Claim 22 sets out storage media. In step (a) of claims 10 and 22, upon a user selecting content within a network document to be clipped, the content is parsed for clickable images and any found clickable images are indicated. This is not disclosed or suggested by the art cited by Examiner.

Examiner has cited Mankoff as disclosing the subject matter of claims 10 and 22. Examiner has asserted that inherent in displaying a web site, the page must be parsed and an indication must be made of items, such as links, which are clickable.

There are notable differences between the subject matter set out in claims 10 and 22 and the subject matter disclosed by Mankoff. For example, in substep (a.1) of claims 10 and 22, selected content from a network document is parsed for clickable images. In Mankoff, any parsing that might be done would be performed of an entire web site before the web site is displayed. In substep (a.2) of claims 10 and 22, a new window is displayed that indicates the found clickable

images. Mankoff only discloses that all clickable images on an original web site are displayed. In substep (a.3) of claims 10 and 22, upon a user selecting one of the clickable images, a bit-mapped image of the selected clickable image is stored for later access by the user. In Mankoff, this information is not stored. Rather, a file, located on a separate server is downloaded. See Mankoff at column 4, lines 8 through 11.

Table 5 below summarizes some of the key differences between the subject matter set out in claims 10 and 22 and Mankoff.

Table 5

	Claims 10 and 22	Mankoff
When content is selected to be clipped	Selected content from network document is parsed for clickable images.	In Mankoff, content is never selected to be clipped. (An entire web page might be parsed before display of web page. This is not disclosed, but may be inherent in Mankoff. In any event, it is irrelevant to this feature of Applicant's claims)
Where clickable images indicated/displayed	The clickable images found within the content are indicated	All clickable images are displayed as part of the web site.
Result of selecting a clickable image	A bit-mapped image of the selected content is stored	A separate server is accessed to obtain a file associated with an advertisement

As can be seen from Table 5, Mankoff is performing actions unrelated to the subject matter of claims 10 and 22. Mankoff does not disclose or suggest

selected content from network document is parsed for clickable images. Mankoff does not disclose or suggest indicating any clickable images found within the content. Mankoff does not disclose or suggest a bit-mapped image of the selected content is stored when a clickable image is selected.

**Discussion of Independent claims 15 and 24:**

Claim 15 sets out a method for content clipping. Claims 24 sets out storage media. In step (a) of claims 15 and 24, upon a user selecting content within a network document to be clipped, the content is parsed for clickable images. If only one clickable image is found, a bit-mapped image of the selected clickable image is stored for later access by the user. This is not disclosed or suggested by the art cited by Examiner.

Examiner has cited Mankoff and Nilsson as disclosing the subject matter of claims 15 and 24. Examiner has asserted that inherent in displaying a web site, the page must be parsed and an indication must be made of items, such as links, which are clickable. Examiner has cited Nilsson where Nilsson sets out automatic selection of an arrangement when there is only one arrangement found.

Neither Mankoff nor Nilsson disclose or suggest the subject matter disclosed in claims 15 and 24 of the present case. For example, in step (a) of claims 15 and 24, upon a user selecting content within a network document to be clipped, the content is parsed for clickable images. This is not disclosed or

suggested in Mankoff nor Nilsson. Further, in substep (a.2.1) of claim 1, a bit-mapped image of the found clickable image is stored for later access.

Table 6 below summarizes some of the key differences between the subject matter set out in claims 15 and 24 and Mankoff/Nilsson.

Table 6

	Claims 15 and 24	Mankoff & Nilsson
When content is selected to be clipped	Selected content from network document is parsed for clickable images.	In Mankoff, content is never selected to be clipped. (An entire web page might be parsed before display of web page. This is not disclosed, but may be inherent in Mankoff. In any event, it is irrelevant to this feature of Applicant's claims)
Result when only one clickable image is found	A bit-mapped image of the clickable image is <i>stored</i>	In Mankoff: Any clickable image is <i>displayed</i> as part of a web page display. In Nilsson: automatic selection within a telecommunication network is disclosed.

As can be seen from Table 6, Mankoff is performing actions unrelated to the subject matter of claims 15 and 24. Mankoff does not disclose or suggest selected content from network document is parsed for clickable images. Mankoff does not disclose or suggest storing a bitmap image of a clickable image, when one clickable image is found.

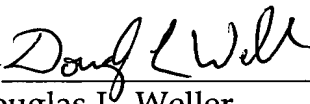
Applicant notes that Nilsson only discloses making selections within a telecommunication network. It is not believed that Nilsson discloses subject

matter pertinent to the pertinent subject matter set out in claims 15 and 24 such as parsing selected content within a network document and storing a bit-mapped image of a clickable image.

**Conclusion**

Applicant believes that the present case is in condition for allowance and favorable action is respectfully requested.

Respectfully submitted,  
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